

**ZENO B. BAUCUS**  
**Assistant U.S. Attorney**  
**U.S. Attorney's Office**  
**James F. Battin U.S. Courthouse**  
**2601 Second Ave. North, Suite 3200**  
**Billings, MT 59101**  
**Phone: (406) 657-6101**  
**FAX: (406) 657 6989**  
**E-mail: Zeno.Baucus@usdoj.gov**

**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

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**UNITED STATES OF AMERICA,**  
**Plaintiff,**  
**vs.**  
**USMAN HANIF KHAN,**  
**Defendant.**

**CR 25-71-BLG-SPW**

**OFFER OF PROOF**

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The United States of America, represented by Zeno B. Baucus, Assistant United States Attorney for the District of Montana, files its Offer of Proof in anticipation of the Change of Plea hearing scheduled for June 23, 2025.

## **THE CHARGE**

The defendant, Usman Hanif Khan, is charged by Information with one count of Use of Facility in Interstate Commerce in Aid of Racketeering, in violation of 18 U.S.C. § 1952(a)(3).

## **PLEA AGREEMENT**

Khan will plead guilty to the count in the Information pursuant to a plea agreement. The United States presented all formal plea offers to the defendant in writing. The plea agreement entered into by the parties and filed with the court represents, in the government's view, the final and the most favorable offer extended to the defendant. *See Missouri v. Frye*, 566 U.S. 134, 145-46 (2012).

## **ELEMENTS OF CHARGE**

In order for Khan to be found guilty of the charge contained in the Information, the United States must prove each of the following elements beyond a reasonable doubt:

First, the defendant used a facility of interstate or foreign commerce, the internet and a cellphone, with the intent to promote, manage, establish, or carry on or facilitate the promotion, management, establishment, or carrying on of promotion of prostitution, in violations of the laws of the State of Montana or the United States; and

Second, after doing so the defendant performed or attempted to perform an act to promote, manage, establish and carry on or facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

## **PENALTY**

This offense carries a penalty of a maximum five years imprisonment, a \$250,000 fine, three years of supervised release, and a \$100 special assessment.

## **ANTICIPATED EVIDENCE**

If this case were tried in United States District Court, the United States would prove the following:

Prior to April 9, 2023, Khan met Veronica Baker on a social media website for those interested in a commercial sex relationship. Then, on or about April 9, 2023, Khan communicated with Veronica Baker for the purpose of arranging a commercial sex date with Jane Doe, a minor. Khan and Baker communicated via text messenger and utilized cellular telephones to arrange the date and discussed, among other items, the particulars of the commercial sex date. That evening Baker transported Jane Doe to Khan's residence for the purpose of a commercial sex date. Khan and Jane Doe engaged in a sex act, after which Khan contacted Baker to arrange transportation of Jane Doe and provided Jane Doe with money for the encounter.

At the time, prostitution was illegal under the laws of the State of Montana.

DATED this 18th day of June, 2025

KURT G. ALME  
United States Attorney

/s/ Zeno B. Baucus  
ZENO B. BAUCUS  
Assistant U.S. Attorney